



GRASSO LAW FIRM, P.C.

2250 East Germann Road, Suite 10
Chandler, Arizona 85286
(480) 739-1200

Robert Grasso, Jr., Bar No. 015087

Robert J. Lydford, Bar No. 030649

N. Patrick Hall, Bar No. 023246

rgrasso@grassolawfirm.com

rlydford@grassolawfirm.com

phall@grassolawfirm.com

minuteentries@grassolawfirm.com

Attorneys for Defendant Jewish Voice
Ministries International

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF ARIZONA

Kristina M. Kelley, an individual,

Plaintiff,

v.

Jewish Voice Ministries International, a
corporation,

Defendant.

Case No.

**DEFENDANT JEWISH VOICE
MINISTRIES
INTERNATIONAL'S NOTICE OF
REMOVAL UNDER 28 U.S.C. §
1441(c) (FEDERAL QUESTION)**

To: Clerk of the above-entitled Court

PLEASE TAKE NOTICE that Defendant, by and through undersigned counsel,
hereby removes to this Court the state court action described below.

1. On January 31, 2023, an action was commenced in the Superior Court of the
State of Arizona in and for the County of Maricopa, entitled *Kristine M. Kelley v. Jewish
Voice Ministries International*, No. CV2023-001625.

2. On February 7, 2023, Defendant received service of Plaintiff's Summons,
Complaint, and Certificate of Compulsory Arbitration.

3. In accordance with 28 U.S.C. § 1446(a) and LRCiv 3.6, the most recent version of the docket from the State Court is attached hereto as Exhibit A, and all pleadings and other documents that were previously filed with the state court are attached hereto as Exhibits B through E.

4. In accordance with LRCiv 3.6(b), undersigned counsel hereby verifies that Exhibits B through E are true and complete copies of all pleadings and other documents filed in the State Court proceeding.

5. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. § 1441(c)(1)(A) because the claims in Plaintiff's Complaint arise under federal law, specifically the Family and Medical Leave Act, 29 U.S.C. § 2601 *et seq.*

6. In accordance with LRCiv 3.6(a), a copy of this Notice has been filed with the Clerk of the Maricopa County Superior Court.

RESPECTFULLY SUBMITTED this 27th day of February, 2023.

GRASSO LAW FIRM, P.C.

By /s/N. Patrick Hall
Robert Grasso, Jr.
Robert J. Lydford
N. Patrick Hall
2250 East Germann Road, Suite 10
Chandler, Arizona 85286
Attorneys for Defendant